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SUPERFUND DIV.  
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July 29, 2011

**Via Certified Mail – Return Receipt Requested**

Mr. Kevin Shade, Enforcement Officer  
Superfund Enforcement Assessment Section (6SF-TE)  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733

**RE: Gulfco Marine Maintenance Superfund Site, Freeport, Brazoria County,  
Texas, SSID No. 06JZ**

Dear Mr. Shade:

Enclosed please find DuPont's response to your information request of July 5<sup>th</sup>, 2011. We have conducted a good faith review of our records and found no information regarding the site.

If you have any further questions, please feel free to contact me at the above address.

Sincerely,

James B. Allen

JBA:dwd

Enclosure



640304

**ENCLOSURE 3**

**GULFCO MARINE MAINTENANCE SUPERFUND SITE  
INFORMATION REQUEST**

**QUESTIONS**

**General Information Concerning Respondent**

1. Provide the full legal name and mailing address of the Respondent.

**E. I. du Pont de Nemours and Company  
1007 Market Street  
Wilmington, Delaware 19898**

2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer.

**DuPont maintains contacts for CERCLA matters at its U. S. operating facilities. The contacts at its Texas and Louisiana facilities, and the Sourcing function were requested to conduct a diligent, good faith search for any documents and information pertaining to the Site. These DuPont personnel are represented by DuPont Corporate Counsel, James B Allen. Any attempt to contact employees should be made through his office at 302-774-8553.**

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.

**James B. Allen, Esq.  
DuPont Legal D-7084  
1007 Market Street  
Wilmington, Delaware 19898**

**Telephone: 302-774-8553**

Specific Information relating to Site Operations

4. Identify and include a brief description of the nature, timeframe(s) and status of the Respondent's business relationships with Gulfco Inc., Gulfco Marine Maintenance, Inc., Fish Engineering and Construction, Inc., Hercules Marine Services Corporation, LDL Coastal Limited L.P., LDL Management LLC, and any other previous or current owner or operator of the Site.

**After performing a good faith, diligent search, DuPont could not find any information or any records pertaining to the Site. The only documents DuPont has are those recently provided by EPA. DuPont employs a records retention policy that provides for the orderly maintenance of those records important to its business. In the interest of economy and efficiency, the records retention policy provides a specific time frame for the disposal of records that are no longer pertinent to its business or required by law to be maintained. DuPont will supplement this response should additional information be found which is responsive to this request.**

5. Identify all transactions with the Site owners and/or operators of the Site that resulted in materials being sent to the Site by you for any purpose, including but not limited to barge cleaning. Identify and provide all documents related to each transaction, including but not limited to invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
  - a. The type and purpose for the transaction;
  - b. A description of the materials involved, including their quantity and chemical content and characteristics;
  - c. Any amounts paid by you in connection with each transaction;
  - d. The date of each transaction; and
  - e. The date the materials were sent to the Site.

**DuPont does not have any information or knowledge. Please see Responses # 2 and #4.**

6. Identify all persons, including the Respondent, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials, hazardous materials, hazardous substances, and/or hazardous wastes (materials) from various facilities to the Site. This information shall identify and state, but not be limited to the following:
  - a. The persons with whom the Respondent made such arrangements;

- b. The precise locations from which these materials originated;
- c. The nature, including the chemical content, characteristics, physical state (e.g., solid or liquid) and quantity (e.g., volume or weight) of all materials involved in each such arrangement;
- d. All tests, analyses, analytical results, and manifests concerning each material involved in such transactions;
- e. The persons who selected the location to which the materials were to be disposed and/or treated. In particular, the persons who selected the Site as a location for disposal and/or treatment of the materials. This information shall include where these persons intended to have the materials involved in each arrangement treated or disposed and all evidence of their intent;
- f. The amount paid in connection with each such arrangement, the method of payment, and the identity of the persons involved in each payment transaction; and
- g. Provide contracts or other documents reflecting such arrangements for transportation, disposal, and/or treatment of materials.

**DuPont does not have any information or knowledge. Please see Responses #2 and #4.**

- 7. Identify the corporate relationship(s) (such as successor by name change, successor by merger, etc.) between the named recipient of this request and its related entities as named at the time materials were sent by Respondent to the Site. Provide the corporate records which document that corporate relationship[s], including but not limited to documents related to mergers, acquisitions, sales, and assignments of liability.

**DuPont is a global corporation more than 200 years old.**

- 8. List all federal, state, and local permits, identification numbers, and/or registrations issued to the Respondent's operation for the storage, transport, and/or disposal of materials. Include respective permit numbers.

**Since DuPont does not have any information pertaining to the Site, it cannot respond to this question. Furthermore, DuPont is a global corporation more than 200 years old and operates or has operated through its history more than 125 plants in the United States. Hence this question would be extremely burdensome for DuPont to answer referencing all facilities and time frames. Furthermore, DuPont maintains a Records Retention Policy as stated in Response #4.**

- 9. Provide names and addresses for all carriers who transported materials on behalf of Respondent to hazardous waste treatment, storage, or disposal facilities permitted by EPA or the State.

**Please see Response #8.**

10. Identify whether a Notification of Hazardous Waste Activity was ever filed with EPA or the corresponding agency or official of the State. This information shall include, but not be limited to the following:
- a. The date of such filing;
  - b. The wastes described in such notice;
  - c. The quantity of the wastes described in such notice; and
  - d. The identification number assigned to such facility by EPA or the State.

**Please see Response #8.**

11. Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.

**Please see Response #8.**